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June 30, 2004

Honorable Rya W. Zobel U.S. District Court for the District of Massachusetts John Joseph Moakley U.S. Courthouse; 5th floor I Courthouse Way Boston, MA 02210

Dear Judge Zobel:

This letter is being submitted on behalf of both parties in response to your request for a status report on settlement discussions as of today's date. We completed the depositions of Jennifer Harris (driver) and Catherine Harris (plaintiff) yesterday in Boston. Based on the information developed in these depositions, counsel for General Motors requires additional time to have the facts and technical issues examined by expert witnesses - most likely in the areas of biomechanics, injury causation, and restraint system design. Although Plaintiff's counsel has made a demand that he has indicated is negotiable, counsel for General Motors is not in a position to make a recommendation to his client concerning an appropriate value for this case for settlement purposes until this technical analysis has been completed. The parties suggest that a second status report be submitted to the Court in 90 days or at some time that suites the

Thomas . Sweeney

Counsel for General Motors Corporation

Peter J. Black

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Counsel for Catherine Harris

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June 30, 2004

Via Facsimile and Hand Delivery

Lisa Urso, Clerk for the Honorable Rya Zobel

United States District Court For the District of Massachusetts

One Courthouse Way Boston, MA 02210

RE:

Catherine Harris v. General Motors Corporation

United States District Court for the District of Massachusetts

Civil Action No. 04-10007RWZ

Haddonfield, NJ

Harrisburg

Boston

Dear Ms. Urso:

Morgantown, WV

Philadelphia

Pittsburgh

Washington, D.C.

Enclosed please find a copy of the joint status letter regarding settlement

discussions in the above-referenced matter. An original will be delivered to the

Courthouse forthwith.

Thank you for your attention in this matter.

Cand tally

Very truly yours,

David B. Hobbie

BWE/mhm Enclosure

cc:

Melissa Lightcap Cianfrini, Esq. (with enclosure)

Peter Black, Esq. (with enclosure)

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ECKERT SEAMANS ATTORNEYS AT LAW